

1 Timothy R. Titolo, Esq.
2 Nevada Bar No. 003617
3 TITOLO LAW OFFICE
4 9950 West Cheyenne Ave.
5 Las Vegas, Nevada 89129
6 (702) 869-5100
7 tim@titololaw.com

8
9 John D. McKay, Esq.
10 *Admitted pro hac vice*
11 PARK AVENUE LAW LLC
12 127 W. Fairbanks Ave. No. 519
13 Winter Park, Florida 32789
14 (800) 391-3654
15 johndmckayatty@gmail.com

16
17 **Attorneys for Plaintiffs**

18
19 **UNITED STATES DISTRICT COURT**
20 **FOR THE DISTRICT OF NEVADA**

21
22 PETER DELVECCHIA, *et al.*,) **Case No: 2:19-CV-01322-KJD-DJA**
23)
24 Plaintiffs,)
25)
26 vs.) **PLAINTIFFS' RULE 41(a)(1)(A)(i)**
27) **NOTICE OF DISMISSAL OF**
28) **DEFENDANT CHELSIE BRIGHT**
FRONTIER AIRLINES, INC., *et al.*,) **SAKURADA**
Defendants.)
-----)

29
30 Pursuant to the authority of Fed. R. Civ. P. 41(a)(1)(A)(i) and the Ninth Circuit's holding in
31 *Pedrina v. Han Kuk Chun*, 987 F.2d 608 (9th Cir. 1993), Plaintiffs, Peter DelVecchia individually and
32 as next friend of A. D., a minor, by counsel, hereby give notice of their dismissal of their claims
33 against **Defendant Chelsie Bright Sakurada, in her individual capacity, without prejudice**. Per
34 the holding in *Pedrina*, this Notice of Dismissal applies solely to Defendant Chelsie Bright Sakurada
35 and does not dismiss the action as a whole, or Plaintiffs' claims against any other Defendant.

36
37 **NOTICE OF DISMISSAL OF DEFENDANT CHELSIE BRIGHT SAKURADA**
38 Page 1 of 2

1 Moreover, this Notice of Dismissal does not affect any liability of Defendant Frontier Airlines, Inc.
2 under the doctrine of *respondeat superior* for the negligence and/or intentional acts of its employee
3 Chelsie Bright Sakurada.

4

5 DATED this 28th day of May, 2020.

6

7 /s/ John D. McKay

8 John D. McKay (admitted *pro hac vice*)
9 PARK AVENUE LAW LLC
10 127 W. Fairbanks Ave., No. 519
11 Winter Park, FL 32789
12 johndmckayatty@gmail.com
13 (800) 391-3654

14 Timothy R. Titolo (Nev. Bar. No. 3617)
15 TITOLO LAW OFFICE
16 9950 West Cheyenne Avenue
17 Las Vegas, Nevada 89129
18 (702) 869-5100
19 tim@titololaw.com

20 ***Attorneys for Plaintiffs Peter DelVecchia***
21 ***And A.D., a Minor***